

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

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| In re: Bernice Louellen Shippen, Debtor . TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE, Movant. v. Bernice Louellen Shippen, Debtor/Respondent Scott F. Waterman, Esquire Trustee/Respondent | Bankruptcy No. 24-11427-amc Chapter 13 Hearing Date: September 18, 2024 Hearing Time: 10:00a.m. Location: Courtroom #4, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107 |
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CERTIFICATE OF NO OBJECTION

The undersigned hereby certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion for Relief from Stay, filed at Docket No. 35, appears thereon. It is hereby respectfully requested that the Order attached to the Movant's Motion for Relief from the Automatic Stay be entered by the Court.

Dated: September 16, 2024

**Robertson, Anschutz, Schneid, Crane
& Partners, PLLC**
Attorney for Movant
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Telephone: 470-321-7112
By: /s/ Michelle L. McGowan
Michelle L. McGowan
PA Bar Number 62414
Email: mimcgowan@raslg.com

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| <p>In re:</p> <p>Bernice Louellen Shippen, Debtor .</p> <p>TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE, Movant.</p> <p>v.</p> <p>Bernice Louellen Shippen, Debtor/Respondent Scott F. Waterman, Esquire Trustee/Respondent</p> | <p>Bankruptcy No. 24-11427-amc</p> <p>Chapter 13</p> <p>Hearing Date: September 18, 2024 Hearing Time: 10:00a.m. Location: Courtroom #4, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107</p> |
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**CERTIFICATE OF SERVICE OF MOTION OF TOWD POINT MORTGAGE TRUST
2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE
TRUSTEE FOR RELIEF FROM THE AUTOMATIC STAY AND NOTICE OF MOTION**

I, the undersigned, certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on September 16, 2024 I served copies of the Motion for Relief from the Automatic Stay and Notice of Motion upon the parties in interest in this proceeding, by first class U.S. Mail, postage prepaid or electronic mail, at the following addresses:

Bernice Louellen Shippen
108 W Spring Ave Apt 9
Ardmore, PA 19003-1232

MICHAEL A. CIBIK
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 1910

SCOTT F. WATERMAN [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Date: September 16, 2024

**Robertson, Anschutz, Schneid, Crane
& Partners, PLLC**
Attorney for Movant
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
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ORDER OF COURT

AND NOW, this day of , 2024, upon consideration of TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE's Motion for Relief from Automatic Stay, pursuant to 11 U.S.C. § 362(d), any response thereto and that it is not necessary for an effective reorganization, it is hereby ORDERED, that the automatic stay provisions of Section 362 of the Bankruptcy Code are hereby unconditionally terminated with respect to TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE; and it is further

ORDERED, that TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE, its successors and/or assignees be entitled to proceed with appropriate state court remedies against the property located at 112 W. Spring Ave, Ardmore, PA 19003, including without limitation a sheriff's sale of the property, and it is further

ORDERED that TOWD POINT MORTGAGE TRUST 2022-3, U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION AS INDENTURE TRUSTEE's request to waive the 14-day stay period pursuant to Fed.R.Bankr.P. 4001(a)(3) is granted.

BY THE COURT

Hon. Chief Judge Ashely M. Chan
U.S. Bankruptcy Court Judge